

#### ATTORNEYS AND COUNSELORS AT LAW \_\_

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December 30, 2005

#### VIA E-FILING & HAND DELIVERY

Mary L. Cottrell, Secretary Department of Telecommunications and Energy One South Station Boston, MA 02110

Re:

D.T.E. 05-61; Milford Water Company

Dear Ms. Cottrell:

Enclosed for filing please find Milford Water Company's responses to the Information Requests of the D.T.E. Adjudicatory Staff and the Town of Milford set forth on the attached list.

Any questions on this matter should be directed to the undersigned.

Very truly yours,

Eric J. Krathwohl

Encl.

cc: Shaela McNulty Collins, Esq., Hearing Officer -Settlement Intervention Staff

John Geary, Esq., Hearing Officer - Adjudicatory Staff

Gerald M. Moody, Esq. Henry C. Papuga, Manager

Stephen B. Alcott

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### **Responses to Information Requests:**

- DTE 1-1
- DTE 1-2
- DTE 1-3
- DTE 1-4
- DTE 1-5
- DTE 1-6
- DTE 1-7
- DTE 1-8

DTE 1-9 (supplemental)

Town 1-17

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-1

Refer to Exh. SBA-1, Summary Tables 1 through 5. Please provide electronic

copies in Microsoft Excel format of the underlying data.

Response:

The following response includes substantially also responds information

requests DTE 1-2 through DTE 1-5.

A substantial amount of the underlying data was provided in electronic Excel format in the original filing. The underlying data not included in the original filing is being provided in a compressed file named "DTE05-

61 UnderlyingDataFiles.zip". A list of the files included is set forth below.

The files submitted with this response comprise two types of data files – data files provided by the Company to the respondent and data files created by the respondent in the course of preparing the rate case, from paper records.

As indicated, substantial data was included in the original filing. It is noted that the electronic files provided herewith were developed as "working" files and have not necessarily been formatted for printing. Also they may contain some data which was later updated, revised or corrected in the excel file used for the original filing.

Files contained in "DTE05-61\_UnderlyingDataFiles.zip":

1099Distributed-03.xls

**BA DATA.xls** 

Depreciation-03.xls

ElectricUsage-04.xls

FireRevenue-01HP.xls

HP-RateCase-2005Staffing-Revised.xls

mwcfixedassetsfstieinforCIAC.xls

**MWC-Staff Fringe Benefit Matrix.xls** 

**MWC-Staff.xls** 

PostTestYrAdditions.07.30.05.xls

RateCase-1099MiscIncomeModified.xls

RateCase-2004ElectricUsage.xls

RateCase-2005ElectricUsage.xls

RateCase-2005ProFormaHealthInsMatrix.xls

RateCase-HealthInsMatrix3.xls

RateCase-LossonDisposal.xls

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

DTE 1-1 (continued)

RateCase-Materials&Supplies.xls
RateCase-MendonWater&HydSales.xls
RateCase-MonthlyMeterReadingCosts.xls
RateCase-OfficeCash2PaymentProcessingCosts.xls
RateCase-PostTestYrAdditions.xls
RateCase-RE&PPTaxes.xls
RateCase-RE&PPTaxes-Update.xls
RateCase-ShutoffAlocation.xls
RateCase-WaterBillingCosts.xls
RE&PPTaxes-aa01.xls

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-2

Refer to Exh. SBA 1, Proposed Rates, Schs. R-1 through R-9. Please provide

electronic copies in Microsoft Excel format of the underlying data.

**Response:** 

See response to DTE 1-1.

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-3

Refer to Exh. SBA 1, at 2 of 67, Supporting Calculations – Cost of Service, Schs. R-1 through R-9. Please provide electronic copies in Microsoft Excel format of the underlying data.

Response:

See response to DTE 1-1.

It is noted that there is an inadvertent error in the table of contents shown at page 2 of 67 regarding Attachment A, Supporting Calculations — Cost of service. The correct table of contents is shown at page 20 of 67 and lists the schedules as A-1 through A-10.

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-4

Refer to Exh. SBA 1, at 2 of 67, Supporting Calculations - Rate Design, WP-

+Priv Fire Des through WP-BA-Prop-2. Please provide electronic copies in

Microsoft Excel format of the underlying data.

Response:

See response to DTE 1-1.

# MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-5

Refer to Exh. SBA 1, Miscellaneous Workpapers, WP-Payroll through WP-MISC

REV. Summary Tables 1 through 5. Please provide electronic copies in

Microsoft Excel format of the underlying data.

**Response:** 

See response to DTE 1-1.

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Stephen B. Alcott

Response Date:

December 30, 2005

DTE 1-6

Refer to Exh. SBA 1, Comparative Financial Statements. Summary Tables 1

through 5. Please provide electronic copies in Microsoft Excel format of the

underlying data.

Response:

There is no underlying data in Microsoft Excel format. The comparative

financial data was input to the original filing spreadsheet from the

Company's Annual Returns to the DTE.

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent: Response Date:

Henry C. Papuga December 30, 2005

Please refer to Exh. SBA-1, at 52 ("Miscellaneous Expense Calculations"). Explain in detail why the uncollectible amount reported for calendar year 2004 is higher than the uncollectible amount reported for 2002; and further explain why the 2004 uncollectible is higher by an even greater magnitude for 2003.

Response:

The Milford Water Company charges off 'bad debts' each year for amounts that are deemed 'uncollectible'. The amounts charged off include two categories: sales of water and merchandising & jobbing. The amounts charged off for each year are as follows:

Year	Water sales # of accts	Water sales <u>Total \$</u>	M & J sales # of accts	M & J sales <u>Total \$</u>	Total Bad <u>Debt \$</u>
2002	3	374.34	16	10,976.50	\$ 11,350.84 <sup>i</sup>
2003	5	746.71	12	3,475.31	4,222.02i
2004	1	53.17	8	15,783.47 <sup>ii</sup>	15,836.64

The 2004 uncollectible amount is higher than 2002 due to the recommendation of the company's auditor to "charge off" \$13,776.00 billed to the Town of Hopedale for fire service, Without this charge off, the 2004 uncollectible total would have been \$2,060.64.

The 2004 uncollectible amount is higher by a greater magnitude higher than 2003 due to the previously mentioned charge off of \$13,776.00 billed to the Town of Hopedale for fire service. Without this charge off, the 2004 uncollectible would be lower than 2003.

<sup>&</sup>lt;sup>i</sup> The Company's detailed records show data (as set forth in the table above) that differs from the Company's audited financials, which show total bad debt for 2002 and 2003 respectively \$11,082 and \$4,144. The Company is seeking to determine the reason for the difference.

ii The \$13,776 Hopedale write-off described in the text is listed in Company records under M&J Sales, but does relate to Water Sales.

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE ADJUDICATORY STAFF OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY D.T.E. 05-61

Respondent:

Henry C. Papuga

Response Date:

December 30, 2005

DTE 1-9

Please refer to Exh. SBA-1, at 52 ("Miscellaneous Expense Calculations"). Regarding the Employee Health Insurance account, explain in detail why there is a dollar amount difference in monthly premium payments among employees.

#### Supplemental

Response:

In addition to the explanation of the different premium levels among employees described in the original response, the Company notes the increased levels of premium effective 8/1/2005.

The Company's initial filing noted that such expense would be updated when known. This response provides such updating – increasing the company's required revenue requirement by \$26,913.

EMPLOYEE HEALTH INSURANCE						
Rates effective 8/1/2004						
Monthly		Annual				
premiums	No. of Employees	Cost				
\$398.71	4	\$19,138				
\$797.42	4	\$38,276				
\$1,196.31	7	\$100,490				
	15					
PRO FORMA AMOUNT			\$157,904			
less: Amount booked in test ye	ear	_	(120,535)			
Pro Forma Adjustment	AS FILI	ED 9/15/05	\$37,369			
REVISED FOR 2005 PREMI	IUMS EFFECTIVE 8/1	/2005				
Monthly		Annual				
Monthly premiums	No. of Employees	Annual Cost				
Monthly premiums \$466.71	No. of Employees	Annual Cost \$22,402	·			
Monthly premiums \$466.71 \$933.42	No. of Employees 4 4	Annual Cost \$22,402 \$44,804				
Monthly premiums \$466.71	No. of Employees 4 4 7	Annual Cost \$22,402	•			
Monthly premiums \$466.71 \$933.42 \$1,400.13	No. of Employees 4 4	Annual Cost \$22,402 \$44,804	ф10.4.O.1.77			
Monthly premiums \$466.71 \$933.42 \$1,400.13	No. of Employees 4 4 7	Annual Cost \$22,402 \$44,804	\$184,817			
Monthly premiums \$466.71 \$933.42 \$1,400.13  PRO FORMA AMOUNT less: Amount booked in test years.	No. of Employees 4 4 7 15	Annual Cost \$22,402 \$44,804 \$117,611	(120,535)			
Monthly premiums \$466.71 \$933.42 \$1,400.13	No. of Employees 4 4 7	Annual Cost \$22,402 \$44,804 \$117,611	•			

MILFORD WATER COMPANY RESPONSES TO THE FIRST SET OF INFORMATION REQUESTS OF THE TOWN OF MILFORD D.T.E. 05-61

Respondent:

Henry C. Papuga

Response Date:

December 30, 2005

Town 1-17 During the calendar years 2002, 2003 and 2004, how many of each of the following meter sizes did the Milford Water Company install, allow or require to be installed during said years:

5/8" meter

3/4" meter

1" meter

1 1/4" meter

1 1/2" meter

2" meter

3" meter

4" meter

6" meter

8" meter

and for each category, what was the total amount collected as service connection fees as required by the then current Rules and Regulations of the Milford Water Company?

Response: The Milford Water Company purchases new meters as needed and installs them under two current meter programs. They are: 1. Meter

Replacement Program, and 2. New Customer Program.

Please see the attached Excel report providing the specific information as required.

### DTE 05-61, RESPONSE TO TOWN 1-17 ATTACHMENT TOWN 1-17

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Meter	Total New	Meter Replace.	New Customer	Current System	Total S.D.C.
Size	Meters Install.	Program	Program	Development Charge	Fees Billed
5/8	127	33	94	\$150.00	\$14,100.00
3/4	1	0	1	\$225.00	\$225.00
1	10	9	1	\$375.00	\$375.00
1 1/4	0	. 0	0	\$375.00	\$0.00
1 1/2	3	1	2	\$750.00	\$1,500.00
2	1	1	0	\$1,200.00	\$0.00
3	0 .	0 .	0	\$2,400.00	\$0.00
4	0	0	0	\$3,750.00	\$0.00
6	0	0	0	\$7,500.00	\$0.00
8	0	0	0	\$12,000.00	\$0.00
Totals	142	44	98		\$16,200.00

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Meter	Total New	Meter Replace.	New Customer	Current System	Total S.D.C.
Size	Meters Install.	Program	Program	Development Charge	Fees Billed
5/8	215	153	62	\$150.00	\$9,300.00
3/4	0	0	0	\$225.00	\$0.00
1	7	4	3	\$375.00	\$1,125.00
1 1/4	0	0	0	\$375.00	\$0.00
1 1/2	4	1	3	\$750.00	\$2,250.00
2	1	0	1	\$1,200.00	\$1,200.00
3	0	0	. 0	\$2,400.00	\$0.00
4	0	0	0	\$3,750.00	\$0.00
6	0	0	0	\$7,500.00	\$0.00
8	0	0	0	\$12,000.00	\$0.00
Totals	227	158	69		\$13,875.00

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Meter	Total New	Meter Replace.	New Customer	Current System	Total S.D.C.
Size	Meters Install.	Program	Program	Development Charge	Fees Billed
5/8	323	183	140	\$150.00	\$21,000.00
3/4	2	0	2	\$225.00	\$450.00
1	4	0	4	\$375.00	\$1,500.00
1 1/4	0	0	0	\$375.00	\$0.00
1 1/2	0	0	0	\$750.00	\$0.00
2	2	0	2	\$1,200.00	\$2,400.00
3	2	0	2	\$2,400.00	\$4,800.00
4	0	0	0	\$3,750.00	\$0.00
6	0	0	0	\$7,500.00	\$0.00
8	0	0	0	\$12,000.00	\$0.00
Totals	333	183	150		\$30,150.00

#### COMMONWEALTH OF MASSACHUSETTS

#### DEPARTMENT OF TELECOMMUNICATIONS

#### AND ENERGY

D.T.E. 05-61

#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Boston, Massachusetts this 30<sup>th</sup> day of December, 2005.

Eric J. Krathwohl

Counsel

Of Counsel for Milford Water Company